

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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*Counsel to the Ad Hoc Bondholder Group*

In re:

**BED BATH & BEYOND INC., et al.,**

Debtors.<sup>1</sup>

Chapter: 11  
Case No.: 23-13359 (VFP)

Judge: Hon. Vincent F. Papalia  
U.S. Bankruptcy Judge

**MOTION OF THE AD HOC BONDHOLDER GROUP, PURSUANT TO 11 U.S.C.  
§ 105(a), FED. R. CIV. P. 60(b), AND FED. R. BANKR. P. 4001(c) AND 9024, (A) FOR AN  
ORDER VACATING THE INTERIM AND FINAL ORDERS, AMONG OTHER  
THINGS, AUTHORIZING THE DEBTORS TO OBTAIN POSTPETITION  
FINANCING, AND (B) FOR OTHER RELATED RELIEF**

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is 650 Liberty Avenue, Union, New Jersey 07083.

**[UNREDACTED VERSION FILED UNDER SEAL SUBJECT TO MOTION TO SEAL]**

Dated: June 25, 2023

**GENOVA BURNS LLC**

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